

## **REMARKS/ARGUMENTS**

### **I. Introduction:**

Claims 1 and 9 are amended and claims 17-20 are canceled herein. Claims 1, 3-9, 11-16, and 21-22 are currently pending.

The courteous telephone interview granted applicant's undersigned attorney by Examiner Tsegaye on December 12, 2006 is hereby respectfully acknowledged. The 35 U.S.C. 112 and 103 rejections of the Office Action dated August 22, 2006 were discussed. The arguments presented in the interview are set forth below.

### **II. Claim Rejections – 35 U.S.C. 112:**

Claims 1 and 9 have been amended to clarify that the mapping of signals between nodes is selected based on a comparison of a number of signals between each of the input nodes and the center nodes and a comparison of a number of signals between each of the center nodes and the output nodes.

Claims 1 and 9 are believed to comply with the requirements of 35 U.S.C. 112.

### **III. Claim Rejections – 35 U.S.C. 102 and 103:**

Claim 21 stands rejected as being anticipated by U.S. Patent Application Publication No. 2002/0146003 (Kam et al.). Claims 1, 3-9, 11-20, and 22 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,418,142 (Wolf) in view of Kam et al..

Claim 1 has been amended to clarify that mapping links for signals between nodes is selected based on a comparison of a number of signals between each of the input nodes and the center nodes and a comparison of a number of signals between each of the center nodes

and the output nodes, to minimize any differences between the number of signals between the nodes.

Wolf is directed to a process and devices for establishing point-to-multipoint connections and multipoint-to-point connections. As noted by the Examiner, Wolf does not disclose wherein mapping links for signals between nodes is selected to minimize the differences between the number of links between nodes. With regard to this limitation, the Examiner cites Kam et al.

Kam et al. disclose traffic spreading to reduce blocking in a Clos communication network. A load sharing algorithm is used to spread component signals among the midstage switching stages. An ordered list is made that includes each of the midstage switching modules, and each midstage switching module is evaluated in order to identify a first and second midstage switching module that have connections to the destination switching module corresponding to a destination identifier.

Applicant respectfully submits that Kam et al. do not teach selecting mappings links for signals between nodes to minimize the differences between the number of signals between nodes, as set forth in the claims.

Kam et al. first check to see if the connections have sufficient spare bandwidth to accommodate the bandwidth of a component signal. If both connections have sufficient spare bandwidth, the component signal is routed through a first midstage switching module. A second component signal is then routed through a second midstage switching module in order to spread the traffic. A component count variable is incremented after each component signal so that the next component signal will begin at the subsequent midstage module, as long as sufficient bandwidth is available (see, for example, paragraphs [0011] and [0038]).

Kam et al. do not check or compare the number of signals between nodes. In contrast to applicant's invention, Kam et al. use a counter which increases with each signal to move on to a next node. Kam et al. check the node to see if it has sufficient bandwidth for a specified signal, and if so, they map the signal to the node and then move on to the next node. Since Kam et al. spread signals based on bandwidth, there may be a disparate number

of signals between nodes due to variations in bandwidth requirements. Kam et al. do not count or compare the number of signals mapped between nodes.

Accordingly, claims 1, 9, and 21, and the claims depending therefrom, are submitted as patentable over Wolf and Kam et al.

IV. Conclusion:

For the foregoing reasons, Applicant believes that all of the pending claims are in condition for allowance and should be passed to issue. If the Examiner feels that a telephone conference would in any way expedite the prosecution of the application, please do not hesitate to call the undersigned at (408) 399-5608.

Respectfully submitted,



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